28

1	Andrew A. Smith (NM Bar No. 8341)
2	UNITED STATES DEPARTMENT OF JUSTICE Environment & Natural Resources Division
3	201 Third Street NW, Suite 900
4	Albuquerque, NM 87102
5	Phone: (202) 598-3803 Email: andrew.smith@usdoj.gov
6	Zinam unarewisiman@usaoj.gov
7	Attorneys for Defendants
8	Michael W. Daugherty, ESQ. (Co. Bar No. 49074)
9	Pro Hac Vice
	Ramsey L. Kropf, ESQ. (Co. Bar No. 21528) Pro Hac Vice
10	SOMACH SIMMONS & DUNN
11	1155 Canyon Blvd., Suite 110
12	Boulder, CO 80302
13	Telephone (916) 446-7979 mdaugherty@somachlaw.com
14	rkropf@somachlaw.com
15	Frank Lawrence, ESQ. (Ca. Bar No. 147531)
16	Zehava Zevit, ESQ. (Ca. Bar No. 230600) LAW OFFICE OF FRANK LAWRENCE
17	111 Bank St. No. 175
18	Grass Valley, CA 95945
10	Telephone: (530) 362-8434
19	frank@franklawrence.com
20	zehava@franklawrence.com
21	Attorneys for Defendant-Intervenor
22	
23	
24	
25	
26	
27	
28	

1	On December 10, 2025, the Court entered its "Order on Stipulation for		
2	Proposed Briefing Schedule," ECF No. 88. In this Order, the Court set the court-		
3	ordered Mediation date for January 6, 2026. <i>Id.</i> ¶ 1. The Court set the hearing on		
4	Plaintiff Save Our Forest Association's "Motion to Complete the Administrative		
5	Record," ECF No. 81 for the following week, January 12, 2026. To save out-of-town		
6	counsel and client representatives travel time and expense, the Parties respectfully		
7	request that the Court reset the Mediation date to January 13, 2026, the day after the		
8	hearing date. The Parties have conferred with the Mediator assigned to this matter,		
9	and he concurs with the requested change in date for the Mediation.		
10	THEREFORE, the Parties respectfully request that the in-person Mediation		
11	date be reset from January 6, 2026, to January 13, 2026. A proposed form of order		
12	accompanies this Stipulation.		
13			
14	Dated: December 10, 2025	Respectfully Submitted,	
15			
16	By:	/s/ Rachel S. Doughty	
17		GREENFIRE LAW, PC	
18		Rachel S. Doughty 2478 Adeline Street, Suite A	
		Berkeley, CA 94703	
19		Ph/Fax: (510) 900-9502	
20		Email: rdoughty@greenfirelaw.com	
21		Attorneys for Plaintiff	
22			
23	Dated: December 10, 2025	Respectfully Submitted,	
24			
25	By:	/s/ Andrew A. Smith	
26			
27			
28			
		- 3 -	

Ca	se 5:24-cv-01336-JGB-DTB Document 89 #:220		
1	-	UNITED STATES DEPARTMENT OF	
2		JUSTICE Andrew A. Smith	
3		Environment & Natural Resources Division	
4		201 Third Street NW, Suite 900	
5		Albuquerque, NM 87102 Phone: (202) 598-3803	
6		Email: andrew.smith@usdoj.gov	
7		Attorneys for Defendants	
8			
9	Dated: December 10, 2025	Respectfully Submitted,	
10	Respectivity Submitted,		
11	By:	/s/ Michael Daugherty	
12		SOMACH SIMMONS & DUNN	
13		Michael Daugherty, Esq. Attorneys for Specially Appearing	
14		Intervenor Yuhaaviatam of San Manuel	
15		Nation	
16		Attorneys for Defendant-Intervenor	
17			
18	Pursuant to Local Rule 5-4 3 4 11	nereby attest that each of the other signatories	
19	Pursuant to Local Rule 5-4.3.4, I hereby attest that each of the other signatories concur in the filing of this document.		
20			
21	Dated: December 10, 2025	/s/ Rachel S. Doughty	
22		Rachel S. Doughty	
23			
24			
25			
26			
27			
28		- 4 -	
	STIPULATION FOR PROPOSED BRIEFING SCHEDULE – 5:24-cv-01336		

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2025, I electronically filed and served the foregoing with the Clerk of the Court for the United States District Court for the Central District of California using the CM/ECF system, which will send notification of this filing to the attorneys of record.

/s/ Rachel Doughty
Rachel Doughty